UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY CAMDEN VICINAGE

THE ESTATE OF DAVID HENNIS,

by and through its Administrator Ad Prosequendum,:

Patricia Hennis, and Patricia Hennis, in her own

Plaintiffs Right

Case No.: 1:16-cv-04216

٧.

Cumberland County, Warden Robert Balicki, in his: individual capacity, and John Doe Corrections

Officers 1-10 (fictitious individuals) in their individual capacities, & CFG Health Systems, LLC:

Defendants

CERTIFICATION IN SUPPORT OF ATTORNEY'S COSTS

Conrad J. Benedetto, Esquire of full age, hereby certifies as follows:

- 1. I am an attorney, and am entrusted with the management of the above-captioned matter on behalf of the Estate of David Hennis, by and through Patricia Hennis, Administratrix Ad Pros for the Estate.
- Attached hereto as Exhibit "A" is a copy of the itemization of costs in this matter. The costs and 2. expenses are delineated by providers, vendors, and experts retained for the prosecution of this case, and the administration and services provided for the Estate of David Hennis.
- Dr. Jeffrey A. Schwartz was retained to review the entire case file, serve as a consultant 3. throughout discovery, tour the jail and provide an expert report regarding jail policies and procedures. Dr. Schwartz's report was dated June 13, 2018.
- 4. Dr. Charles Siebert was retained to review the autopsy report, all notes and photographs associated with the autopsy report. Dr. Seibert provided a report to analyze the cause of death and opine on the Decedent's pain and suffering. Dr. Seibert's report was dated June 11, 2018.
- 5. Dr. Stan V. Smith was retained to review Decedent's work history, earning capacity, his economic value and the economic impact caused by his death. Dr. Smith's report was dated February 25, 2019.
- Dr. Lawrence Guzzardi was retained to review the entire case history, tour the jail and render 6. consulting services throughout discovery concerning issues involving toxicology, mental health and

Case 1:16-cv-04216-RBK-AMD Document 225 Filed 03/03/22 Page 2 of 2 PageID: 4049

medical care and response of jail and CFG personnel. Dr. Guzzardi's report was dated June 8,

2018.

7. Kathryn Burns, MD, MPH was retained to review the suicide deaths of inmates at the Cumberland

County Jail. No report was obtained.

8. David Rudovsky was retained for post dispositive motion proceedings including review of the

Department of Justice Report, filing of Fed. R.C.P. 60(b) Motion and drafting of Appeal Brief.

9. The Administration costs associated with the Estate involved Surrogate's fees for raising the Estate,

applying for Letters of Administration Ad Pros, Applying for the Estate's EIN, obtaining

renunciations and waivers as needed and applying for Letters of General Administration. Craig

Sokolow, LLM in Tax, was retained to provide Estate consulting services and obtain the Estate EIN.

10. a.) DiPiero Court Reporting was for court reporting fees for depositions of various corrections

officers and CFG personnel including but not limited to Darlene Cochran, Benjamin Robins,

MD, Brian McManus, Amber Garcia, Rena Miller, Capt. Michael Palau, Sgt. William

Holbrook, Joanne Gonzalez, Heriberto Ortiz and Tracey Reed.

b.) Wyble Reporting was for court reporting fees for depositions of various witnesses including

but not limited to Dr. Charles Siebert, Dr. Stan V. Smith, Lawrence Guzzardi, M.D. and Dr.

Jeffrey Schwartz.

c.) Degnan & Bateman was for court reporting fees for depositions of witnesses including but

not limited to Patricia Hennis and Daniel Hennis.

d.) CSR Associates was for court reporting fees for depositions of witnesses including but not

limited to Patricia Hennis.

LAW OFFICES OF CONRAD J. BENEDETTO

By:

CONRAD J. BENEDETTO, ESQUIRE

Attorney for Plaintiffs

Dated: 3/03/2022